

BellSouth Telecommunications, Inc.
Legal Department
1600 Williams Street
Suite 5200
Columbia, SC 29201

Patrick W. Turner
General Counsel-South Carolina

803 401 2900
Fax 803 254 1731

patrick.turner@bellsouth.com

October 27, 2003

The Honorable Bruce Duke
Deputy Executive Director/Acting Executive Director
Public Service Commission of SC
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Application of BellSouth Telecommunications, Inc. to Provide In-Region
InterLATA Services Pursuant to Section 271 of the Telecommunications Act of
1996
Docket No. 2001-209-C

Dear Mr. Duke:

Enclosed for filing are the original and 15 copies of BellSouth Telecommunications, Inc.'s ("BellSouth's") performance data change Notification Reports for November 2003 and preliminary December 2003. These data change Notification Reports are being provided to inform the Commission of the changes BellSouth plans to make to its Performance Measures Analysis Platform ("PMAP") with November data, and previews the changes BellSouth is considering making for December data. A Data Disclosure Report for October 2003 would be filed at this time as well, if needed; however, for October 2003 there are no additional South Carolina validated data issues to be disclosed that affect performance measurement calculations for which a fix has not yet been scheduled.

There are three additional matters that BellSouth would like to bring to the attention of the Commission and the parties. First, in its September 2003 Data Notification filed on September 23, 2003, BellSouth provided notice of a change to Measure PO-1 to correctly capture the benchmark interval of less than or equal to three (3) days (Item No. 2). Although BellSouth expected to implement this change with September 2003 data, the change will be implemented with November 2003 data instead.

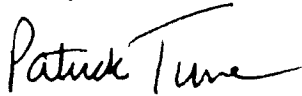
Second, in its October 2003 Data Notification filed on September 23, 2003, BellSouth provided notice of a change to Measure O-11 to combine the EDI and TAG data and to cease reporting this data separately consistent with the Service Quality

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Measurement ("SQM") plan (Item No. 2). Although BellSouth expected to implement this change with October data, the change will be implemented with November 2003 data instead.

Finally, in its June 2003 Data Notification filed on May 19, 2003, BellSouth provided notice of coding changes necessary to correctly capture and report PMAP information due to ENCORE Release 13.0. This change, which was item No.1 on the Proposed June 2003 Data Notification, was not implemented completely for OSS-1 TAG, and BellSouth made additional coding changes with August 2003 data to address this problem

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Turner", with a stylized flourish at the end.

Patrick W. Turner

PWT/nml

Enclosure

cc: All Parties of Record

PROPOSED NOVEMBER 2003 DATA NOTIFICATION

BellSouth proposes making the changes described in this document to generate results for the November 2003 data month. Results for the November 2003 data month will be posted as follows:

Preliminary results December 22, 2003
Final results December 31, 2003

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

- (1) *Affected Measures:* OSS-1, OSS-2, Pre-Ordering & Ordering Measures

Description of Change: In anticipation of Encore Release 14.0 and the associated modifications to the sequence of data fields from BellSouth's source systems (e.g., LEO, LESOG, etc.), BellSouth proposes changes to PMAP to ensure that data is being correctly captured and reported. This proposed change was Item (1) on the Preliminary November 2003 Data Notification filed on September 2, 2003.

Impact of Change: None

- (2) *Affected Measures:* O-3, O-4, O-7, O-8, O-9, O-11 (all states), O-13, O-14 and O-15 (Alabama, Kentucky, Louisiana, Mississippi and South Carolina)

Description of Change: With Encore Release 14.0, BellSouth will implement the ability to electronically process groups of related PONs (RPONs) submitted by CLECs. To accommodate this new capability, BellSouth proposes to use the timestamp associated with the last PON received of any RPON group. This proposed change was Item (2) on the Preliminary November 2003 Data Notification filed on September 2, 2003. (RQ4381)

Impact of Change: Information required to determine the impact is not available.

- (3) *Affected Measures:* O-8 and O-9

Description of Change: The data reported in the interval buckets for Non-Mechanized, Partial Mechanized and Total-Mechanized LSRs do not match the interval assignments contained in the SQM. BellSouth proposes to implement the coding changes necessary to assign correctly the intervals as required by the SQM. (RQ 3790)

Impact: The reports will reflect the correct interval buckets.

- (4) *Affected Measures:* PO-1 & PO-2

Description of Change: PMAP is currently reporting regional level data for both the region and state specific SQM reports. BellSouth proposes changes to PMAP to correct the state specific reports to include state specific data. This proposed change was Item (3) on the Preliminary November 2003 Data Notification filed on September 2, 2003. (RQ4215)

Impact of Change: State specific data will be reported as reflected on the MSS.

Provisioning Measurements

- (5) *Affected Measures:* P-10 (All States except Georgia)

Description of Change: BellSouth is currently producing a TSOCT-Offered report that is not required by any SQM. TSOCT-Offered only include orders where the customer accepts the offered interval. BellSouth proposes ceasing production of this report for all states. This proposed change was Item (7) on the Preliminary November 2003 Data Notification filed on September 2, 2003. (RQ3888)

Impact of Change: Report will no longer be produced.

- (6) *Affected Measures:* P-3 (Georgia only)

Description of Change: Some of the USOCs associated with EELs are not being assigned to the EEL products on the MSS. BellSouth proposes to correct this problem. This proposed change was Item (8) on the Preliminary November 2003 Data Notification filed on September 2, 2003. (RQ3921)

Impact of Change: For May 2003, the result would have changed by less than 0.5%.

- (7) *Affected Measures:* P-7A (Florida & Tennessee only)

Description of Change: The raw data file incorrectly displays whether orders for loops with IDLC are early, on time or late. The required interval for loops with IDLC is 4 hours, but the raw data is reflecting early/on time/late based on an interval of 15 minutes. BellSouth proposes changing the display in the raw data file. This proposed change was Item (9) on the Preliminary November 2003 Data Notification filed on September 2, 2003. (RQ3883).

Impact of Change: None.

- (8) *Affected Measures:* P -4B (Georgia), P -10 (all states except Georgia) and P -14 (Alabama, Kentucky, Louisiana, Mississippi and South Carolina)

Description of Change: With Encore Release 14.0, BellSouth will implement the ability to electronically process groups of related PONs (RPONs) submitted by CLECs. To accommodate this new capability, BellSouth proposes to use the timestamp associated with the last PON received of any RPON group. This proposed change was Item (10) on the Preliminary November 2003 Data Notification filed on September 2, 2003. (RQ4381)

Impact of Change: Information required to determine the impact is not available.

Special Access Measurements

- (9) *Affected Measures:* SA-1, SA-2 & SA-3 (Tennessee)

Description of Change: BellSouth has used the Sales Code and the Work Group to identify Switched Access Trunk ASRs. However, because these identifiers no longer uniquely identify trunk ASRs, BellSouth proposes to use the Traffic Type code on the ASR, which would allow BellSouth to continue to identify Switched Access Trunks. This proposed change was Item (12) on the Preliminary November 2003 Data Notification filed on September 2, 2003. (RQ4336)

Impact of Change: None

General

As part of ongoing process improvements to provide meaningful reports to the CLEC community and the State Public Service Commissions, BellSouth proposes to implement a single, streamlined report that presents SQM data in a format similar to that in the MSS. The new, streamlined report will allow the user community to view a complete set of state ordered measurements in a summary format. It also will eliminate the need to maintain semi-redundant reporting structures and reports and will allow use of the same product rollups as are used in the SQM.

The new report format will contain the following: (i) a single month report showing the CLEC specific data in an MSS like format; (ii) a single month report showing the CLEC aggregate data and the BST aggregate data in an MSS like format; and (iii) a 12-month report showing state CLEC and BST aggregate data and an equity calculation for each of the months with a chart that will provide a graphical representation of the aggregate data. A sample of the new report format will be made public when it becomes available.

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PRELIMINARY DECEMBER 2003 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the December 2003 data month. Results for the December 2003 data month will be posted as follows:

Preliminary results January 21, 2004
Final results January 31, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

(1) *Affected Measures:* OSS-1

Description of Change: Due to an error in the calculation of the interval for Customer Record Information System (CRIS) requests that come through LENS, some transactions are receiving a zero duration. BellSouth proposes to correct this error so that the calculation will include the actual duration. (RQ4499)

Impact of Change: Based on July 2003 data, the Average OSS Response Interval would increase from 2.74 seconds to approximately 3.02 seconds.

Provisioning Measurements

(2) *Affected Measures:* P-7

Description of Change: Currently, hot cuts with durations equal to fifteen minutes are being counted as misses. BellSouth proposes counting these hot cuts as met consistent with the SQM. (RQ4326)

Impact of Change: Regional results for June 2003 would increase by 0.28%.

- (3) *Affected Measures:* P-9

Description of Change: Currently, BellSouth is reporting data for UNE xDSL and ADSL products with conditioning separately from those without conditioning in all states except Florida and Tennessee. Because the SQM requires data to be reported with conditioned and non-conditioned circuits combined for these products in this measure, BellSouth proposes to correct the reporting to agree with the SQM. (RQ4526)

Impact of Change: The ADSL Provided to Retail with and without conditioning and UNE xDSL with and without conditioning product groups would no longer be reported separately.

M&R Measurements

- (4) *Affected Measures:* MR-1, MR-2, MR-3, MR-4 & MR-5

Description of Change: Currently, BellSouth is unable to identify the wire center on some retail services provided over Fiber in the Loop (F/TL). BellSouth proposes using the wire frame code for these services to identify the wire center. (RQ4366)

Impact of Change: Based on August 2003 data the ADSL provided to Retail trouble report rate would increase .36%.

Special Access Measurements

- (5) *Affected Measures:* SA-9

Description of Change: BellSouth omitted the ACNA for one carrier from the company look up table for this measure, which caused that carrier's data to be omitted. BellSouth proposes to update the Special Access Company Lookup table to correct this problem. (RQ4258)

Impact of Change: Based on August 2003 data the IXC trouble report rate would decrease .0007%.

STATE OF SOUTH CAROLINA)
) CERTIFICATE OF SERVICE
COUNTY OF RICHLAND)

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Proposed November 2003 Data Notification Report and Preliminary December 2003 in Docket No. 2001-209-C to be served upon the following this October 27, 2003:

Elliott F. Elam, Jr., Esquire
S. C. Department of Consumer Affairs
3600 Forest Drive, 3rd Floor
Post Office Box 5757
Columbia, South Carolina 29250-5757
(Consumer Advocate)
(U. S. Mail and Electronic Mail)

Sonia Daniels
Law & Government Affairs
AT&T – Southern Region
1200 Peachtree Street, NE, Rm. 4080
Atlanta, Georgia 30309
(AT&T)
(U. S. Mail and Electronic Mail)

Jocelyn G. Boyd, Esquire
Staff Attorney
S. C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)
(U. S. Mail and Electronic Mail)

Russell B. Shetterly, Esquire
P. O. Box 8207
Columbia, South Carolina 29202
(Knology of Charleston and Knology of
South Carolina, Inc.)
(U. S. Mail and Electronic Mail)

Darra W. Cothran, Esquire
Woodward, Cothran & Herndon
1200 Main Street, 6th Floor
Post Office Box 12399
Columbia, South Carolina 29211
(MCI WorldCom Network Service, Inc.
MCI WorldCom Communications and
MCImetro Access Transmission Services, Inc.)
(U. S. Mail and Electronic Mail)

John F. Beach, Esquire
John J. Pringle, Jr., Esquire
Ellis Lawhorne & Sims, P.A.
Post Office Box 2285
Columbia, South Carolina 29202
(Resort Hospitality Services, Inc., NuVox
Communications, Inc., AIN and Momentum Business
Solutions, Inc.)
(U. S. Mail and Electronic Mail)

Marsha A. Ward, Esquire
Michael Henry, Esquire
MCI WorldCom, Inc.
Law and Public Policy
6 Concourse Parkway, Suite 3200
Atlanta, Georgia 30328
(MCI)
(U. S. Mail and Electronic Mail)

Frank R. Ellerbe, Esquire
Bonnie D. Shealy, Esquire
Robinson, McFadden & Moore, P.C.
1901 Main Street, Suite 1500
Post Office Box 944
Columbia, South Carolina 29202
(NewSouth Communications Corp., SCCTA and SECCA
and KMC Telecom III, Inc.)
(U. S. Mail and Electronic Mail)

Genevieve Morelli
Andrew M. Klein
Kelley, Drye & Warren, LLP
1200 19th Street, N.W.
Washington, D.C. 20036
(KMC Telecom III, Inc.)
(U. S. Mail and Electronic Mail)

John D. McLaughlin, Jr.
Director, State Government Affairs
KMC Telecom, Inc.
1755 North Brown Road
Lawrenceville, GA 30043
(KMC Telecom)
(U. S. Mail and Electronic Mail)

Edward Phillips
Attorney
141111 Capital Blvd.
Wake Forest, NC 27587-5900
(Sprint/United Telephone)
(U. S. Mail and Electronic Mail)

Scott A. Elliott, Esquire
Elliott & Elliott
721 Olive Street
Columbia, South Carolina 29205
(Sprint/United Telephone)
(U. S. Mail and Electronic Mail)

Marty Bocock, Esquire
Director of Regulatory Affairs
1122 Lady Street, Suite 1050
Columbia, South Carolina 29201
(Sprint/United Telephone Company)
(U. S. Mail and Electronic Mail)

Faye A. Flowers, Esquire
Parker Poe Adams & Bernstein LLP
1201 Main Street, Suite 1450
Columbia, South Carolina 29202
(US LEC)
(U. S. Mail and Electronic Mail)

William R. Atkinson, Esquire
3100 Cumberland Circle
Cumberland Center II
Atlanta, Georgia 30339-5940
(Sprint Communications Company L.P.)
(U. S. Mail and Electronic Mail)

Andrew O. Isar
Director – State Affairs
7901 Skansie Avenue, Suite 240
Gig Harbor, WA 98335
(ASCENT)
(U. S. Mail and Electronic Mail)

Nanette Edwards, Esquire
ITC^DeltaCom Communications, Inc.
4092 S. Memorial Parkway
Huntsville, Alabama 25802
(U. S. Mail and Electronic Mail)

Timothy Barber, Esquire
Womble, Carlyle, Sandridge & Rice
3300 One First Union Center
301 South College
Suite 3300
Charlotte, North Carolina 20202
(AT&T)
(U. S. Mail and Electronic Mail)

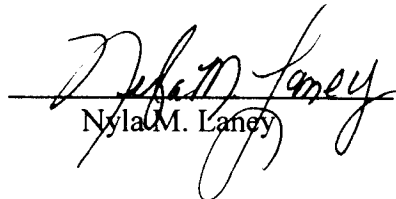
Traci Vanek, Esquire
McKenna & Cuneo, LLP
1900 K Street, N.W.
Washington, DC 20006
(AT&T)
(U. S. Mail and Electronic Mail)

Tami Azorsky, Esquire
McKenna & Cuneo, LLP
1900 K Street, N.W.
Washington, DC 20006
(AT&T)
(U. S. Mail and Electronic Mail)

Michael Hopkins, Esquire
McKenna & Cuneo, LLP
1900 K Street, N.W.
Washington, DC 20006
(AT&T)
(U. S. Mail and Electronic Mail)

William Prescott, Esquire
1200 Peachtree Street, N.E.
Suite 8100
Atlanta, Georgia 30309
(AT&T)
(U. S. Mail and Electronic Mail)

John A. Doyle, Jr., Esquire
Parker, Poe, Adams & Bernstein, L.L.P.
150 Fayetteville Street Mall, Suite 1400
Raleigh, North Carolina 27602
(US LEC of South Carolina)
(U. S. Mail and Electronic Mail)



Nyla M. Laney

PC Docs # 401224